

Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Visual Systems Group, Inc.

Form 499 Filer ID: 821402

Name of signatory: Marc Kremer

Title of signatory: Vice President of Technology Services

I, Marc Kremer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Description of CPNI Policies and Procedures

Visual Systems Group, Inc. ("VSGi"), maintains the security of CPNI. The company has security measures in place to protect this data from external attacks to its website and improper verbal requests for data via personal contacts with VSGi's customer care. VSGi's web portal allows customers to view traffic data. The web portal has login/password security and uses encryption to ensure the security of this information. The web portal limits customers to accessing their specific data only. The company has procedures in place that allow only customers of record to obtain specific call detail information. The company's employees have been trained in the proper use of CPNI, and the company will enforce strict disciplinary measures for employees that misuse or mishandle CPNI. VSGi does not provide CPNI to any third parties and does not sell CPNI.